

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

GREGORY BOUTCHARD and SYNOVA  
ASSET MANAGEMENT, LLC, individually  
and on behalf of all others similarly situated,

Plaintiffs,  
v.

KAMALDEEP GANDHI, YUCHUN MAO  
a/k/a BRUCE MAO, KRISHNA MOHAN,  
TOWER RESEARCH CAPITAL LLC, and  
JOHN DOE NOS. 1-5,

Defendants.

Case No. 1:18-cv-07041

Hon. John J. Tharp, Jr.

**CLASS PLAINTIFFS' MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT WITH TOWER RESEARCH CAPITAL LLC**

Class Plaintiffs, by and through their undersigned counsel, and pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, will respectfully move this Court on Friday, July 30, 2021 at 10:00 a.m., before the Honorable John J. Tharp, Jr., United States District Judge, at the United States District Court for the Northern District of Illinois, Eastern Division, Everett McKinley Dirksen Federal Building, 219 South Dearborn Street, Chicago, Illinois, for entry of the [Proposed] Order of Settlement With Tower Research Capital LLC and Judgment that, among other things: (1) finds the Settlement to be fair, reasonable, adequate, and in the best interests of the Class such that final approval is warranted; (2) finally certifies the proposed Settlement Class for settlement purposes, as defined in the Court's March 5, 2021 Order Preliminary Approving the Proposed Settlement (ECF No. 132); (3) finds the program of notice to be the best practicable notice under the circumstances and fully compliant with due process and Fed. R. Civ. P. 23; and (4) approves the proposed Distribution Plan as fair, reasonable, and adequate.

In support of their motion, Class Plaintiffs rely on (i) Class Plaintiffs' Memorandum of Law in Support of Motion for Final Approval of Class Action Settlement with Tower Research LLC; (ii) the Declaration of Vincent Briganti in Support of (A) Class Plaintiffs' Motion for Final Approval of Class Action Settlement with Tower Research LLC; and (B) Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses, dated May 27, 2021; (iii) the Declaration of Steven J. Straub on Behalf of A.B. Data, Ltd. Regarding Notice and Claims Administration; and (iv) the record herein.

Dated: May 27, 2021  
White Plains, New York

**LOWEY DANNENBERG, P.C.**

/s/Vincent Briganti  
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*Additional Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 27, 2021, I electronically filed the foregoing motion and supporting papers with the Clerk of the Court using the CM/ECF system. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this notice as service of this document by electronic means.

Dated: May 27, 2021

Vincent Briganti

Vincent Briganti